

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**GAIL O'NEIL, as next friend to her
minor daughter
Plaintiff,**

v.

**TEXAS DEPARTMENT
OF CRIMINAL JUSTICE, *et al.*,
Defendants.**

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Civil Action No. 2:10-CV-3-J

DEFENDANTS' DESIGNATION OF EXPERTS

TO THE HONORABLE JUDGE OF THE DISTRICT COURT:

NOW COME Defendants Joe S. Nunn, Hugo Orozco, Kevin Andis, Robin Pena, Michael Savers, John Heuerman, Jr., Brad Livingston and the Texas Department of Criminal Justice, by and through their attorney of record, the Attorney General for the State of Texas, and file this **Designation of Experts**, and in support thereof, offer the following:

Defendants hereby designate the following:

1. Bill Calhoun, MD
J. Andrew Grant, MD
Department of Internal Medicine
University of Texas Medical Branch
301 University Boulevard
Galveston, Texas 77555-0561
(409) 772-2436
(409) 772-9532 fax

Dr. Grant or Dr. Calhoun will give expert testimony and opinions regarding plaintiff's medical condition, treatment while incarcerated at the Jordan Unit.

2. Bill Stephens
Office of the Deputy Director
Prison/Jail Operations
PO Box 99
Huntsville, Texas 77342
936/437-6318 office
936/437-8725 fax

Mr. Stephens will testify regarding Texas Department of Criminal Justice policies and procedures. He will give specific testimony regarding the conduct of the correctional staff immediately before, during, and after Plaintiff died.

3. Warden Joe Nunn
Johnston SAFPF Unit
703 Airport Road
Winnsboro, Texas, 75494

Mr. Nunn will testify regarding Texas Department of Criminal Justice policies and procedures. He will give specific testimony regarding the conduct of the correctional staff immediately before, during, and after Plaintiff died.

4. Nizam Peerwani
Tarrant County Medical Examiners Office
200 Feliks Gwordz Place
Fort Worth, Texas, 76104
817-920-5700

Dr. Peerwani will testify regarding the cause of death of Shermaine Peterson.

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

C. ANDREW WEBER
First Assistant Attorney General

DAVID S. MORALES
Deputy Attorney General for Civil Litigation

DAVID A. TALBOT, JR.
Assistant Attorney General
Chief, Law Enforcement Defense Division

/s/ Bruce R. Garcia
BRUCE R. GARCIA
Assistant Attorney General
Attorney-in-Charge
State Bar No. 07631060

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Austin, Texas 78711
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bruce.garcia@oag.state.tx.us

ATTORNEYS FOR DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, BRUCE R. GARCIA, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the foregoing **Defendants' Designation of Experts** in accordance with the Electronic Case Files System of the Northern District of Texas, on this the 16th day of April, 2010.

/s/ Bruce R. Garcia
BRUCE R. GARCIA
Assistant Attorney General

CERTIFICATE OF SERVICE

I, BRUCE R. GARCIA, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the foregoing **Defendants' Designation of Experts** has been served by placing same in the United States Mail, postage prepaid, on this 16th day of April, 2010, addressed to:

James C. Harrington - **Via Facsimile No. 474-0726 and Via U.S. Regular mail**
Texas Civil Rights Project
1405 Montopolis Drive
Austin, TX 78741-3438
Counsel for Plaintiff

/s/ Bruce R. Garcia
BRUCE R. GARCIA
Assistant Attorney General